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VIA ECF

Honorable Robert B. Kugler
United States District Court
Mitchell H. Cohen Building and
U.S. Courthouse
4th and Cooper Streets
Camden, New Jersey 08101

Re: ***In re Valsartan, Losartan, and Irbesartan Liability Litigation,***
Case No. 1:19-md-02875-RBK (D.N.J.)

Dear Judge Kugler:

Please accept this letter on behalf of the Plaintiffs' co-lead counsel, to provide the Court with an update and to request a modification to the Plaintiffs' leadership structure. Since the entry of CMO 6 in May 2019, and the Court's recent modification order in March 2022, the circumstances of certain attorneys on the Plaintiffs' Steering Committee ("PSC") or their law firms have changed such that Plaintiffs' co-lead counsel recommends the appointment of Madeline Pendley to the Plaintiffs' Steering Committee.

Daniel Nigh, court-appointed Plaintiffs' co-lead counsel, was a shareholder at Levin Papantonio Rafferty in May 2019 when he was appointed. At the beginning of this year, Daniel Nigh amicably left Levin Papantonio Rafferty to start his own law firm with partners Marlene Goldenberg, Brett Vaughn and Ashleigh Raso.

Madeline Pendley, of Levin Papantonio Rafferty, worked alongside Daniel Nigh at Levin Papantonio Rafferty and has continued to be actively involved with

the valsartan litigation. She has deposed or been involved with the depositions of defendant corporate witnesses and an expert witness. In addition, she has written multiple briefs and assisted with drafting various complaints. She has also been involved with taking and defending multiple depositions as part of the bellwether process. She and Levin Papantonio Rafferty have confirmed their commitment to the necessary substantial work and financial contributions of membership on the Plaintiffs' Steering Committee, as requested by leadership going forward in the litigation.

Should the Court be inclined to grant this request, a form of order is attached hereto. We are of course available to answer any questions the Court may have.

Thank you for your courtesies and consideration.

Respectfully,



Adam M. Slater